

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

Defense Distributed, *et al.*

*Plaintiffs,*

v.

Matthew J. Platkin, Acting New Jersey  
Attorney General,

*Defendant.*

No. 3:19-cv-4753

No. 3:21-cv-9867

**Plaintiffs' Notice of Motion to Reconsider  
the Order Denying Plaintiffs' Motion to Transfer and  
Request for Expedited Consideration**

BECK REDDEN LLP  
Chad Flores  
cflores@beckredde.com  
1221 McKinney Street, Suite 4500  
Houston, Texas 77010  
(713) 951-3700

HARTMAN & WINNICKI, P.C.  
Daniel L. Schmutter  
dschmutter@hartmanwinnicki.com  
74 Passaic Street  
Ridgewood, New Jersey 07450  
(201) 967-8040

Counsel for Plaintiffs

PLEASE TAKE NOTICE that:

1. Plaintiffs move for reconsideration of the Opinion entered in Case No. No. 3:19-cv-4753 as Document 59 on July 27, 2022, and the Order entered in Case No. No. 3:19-cv-4753 as Document 59 on July 27, 2022.

2. Plaintiffs support the motion and request for expedited treatment with their amended complaint and the brief and other matters submitted herewith.

3. Plaintiffs do not request oral argument.

4. Plaintiffs submit a proposed form of order herewith.

5. Plaintiffs request expedited consideration because the case involves extraordinary constitutional concerns, irreparable injury that is occurring now, and further irreparable injury that is imminently threatened. The United States Court of Appeals for the Fifth Circuit has ruled that this case belongs in the United States District Court for the Western District of Texas and – critically – that, “[u]pon return of this case to the Western District of Texas, the court should entertain a motion for preliminary injunction expeditiously.” *Def. Distributed v. Bruck*, 30 F.4th 414, 421 n.2 (5th Cir. 2022). Expediting this Court’s handling of the transfer back to Texas fulfills that key aspect of the Fifth Circuit’s decision.

Date: July 27, 2022

BECK REDDEN LLP  
Chad Flores  
cflores@beckredden.com  
1221 McKinney Street, Suite 4500  
Houston, Texas 77010  
(713) 951-3700

Respectfully submitted,

HARTMAN & WINNICKI, P.C.  
s/ Daniel L. Schmutter  
Daniel L. Schmutter  
dschmutter@hartmanwinnicki.com  
74 Passaic Street  
Ridgewood, New Jersey 07450  
(201) 967-8040

Counsel for Plaintiffs